SOUTHERN DISTRICT OF NEW YORK		
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IN RE AMERICAN INTERNATIONAL	:	
GROUP, INC. SECURITIES LITIGATION	:	Master File No. 04 Civ. 8141 (DAB) (AJP)

This Document Relates To: All Actions

UNITED STATES DISTRICT COURT

DECLARATION OF THOMAS A. DUBBS IN SUPPORT OF LEAD PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT WITH AMERICAN INTERNATIONAL GROUP, INC.

THOMAS A. DUBBS declares as follows, pursuant to 28 U.S.C. § 1746:

- 1. I am a Senior Partner of the law firm of Labaton Sucharow LLP ("Labaton Sucharow"), Court-appointed Co-Lead Counsel for the Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and Ohio Police & Fire Pension Fund (collectively "Lead Plaintiff"), in the above-titled action (the "Action"). I am admitted to practice before this Court.
- 2. I submit this Declaration in support of Lead Plaintiff's Motion for Preliminary Approval of Class Settlement with American International Group, Inc.
- 3. Annexed hereto as Exhibit 1 is a true and correct copy of the firm resume of Labaton Sucharow LLP.
- 4. Annexed hereto as Exhibit 2 is a true and correct copy of the firm resume of Hahn Loeser & Parks LLP.

5. Annexed hereto as Exhibit 3 is a true and correct copy of the Agreement of Compromise and Settlement, dated November 30, 2010, with annexed exhibits.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 30, 2010.

THOMAS A. DUBBS